

ECF filed: 4/6/20

1 Law Office of Nathan R. Zeltzer
NATHAN R. ZELTZER, ESQ.
2 The Law Office of Nathan R. Zeltzer, Ltd.
232 Court St.
3 Reno, Nevada 89501
(775) 329-6400

4 Attorney for Reno Patio and
5 Fireplaces, LLC a Nevada
Limited liability company,
6 Et al

7 UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA
8 ooo

9 BK-N-20-50017-BTB

10 IN RE

CHAPTER 7

AFFORDABLE PATIOS & SUNROOMS
11 dba RENO PATIO AND FIREPLACES,
Debtor(s).

Adv. No. 20-50004-BTB

12
13 CHRISTOPHER P. BURKE, CHAPTER
SEVEN TRUSTEE

14 Plaintiff,

15 vs.

16 AFFORDABLE PATIOS & SUNROOMS
dba RENO PATIO AND FIREPLACES
17 a Nevada Corporation, RENO
PATIO AND FIREPLACES, LLC a
18 Nevada limited liability
company, MILL STREET AUTO, a
19 fictitious business entity
of RENO PATIO AND FIREPLACES
20 LLC, and RICHARD TAYLOR, an
individual

21 Defendants,
22 /

23 STIPULATION TO EXTEND TIME TO FILE ANSWER TO ADVERSARY COMPLAINT

24
25 The Debtor, Reno Patio and Fireplaces a Nevada Corporation,
26 and the Chapter 7 Trustee, Christopher P. Burke, hereby enter
27
28

1 this Stipulation to allow Reno Patio and Fireplaces, LLC to extend
2 time to file an Answer as to the Plaintiff's Adversary Complaint.

3 1. The above Defendant's affiliated company Affordable
4 Patios and Sunrooms dba Reno and Patio and Fireplaces filed its
5 Ch. 7 bankruptcy on January 7, 2020.

6
7 2. The initial 341 meeting of creditors was scheduled for
8 February 6, 2020 and has been continued to April 16, 2020.

9 3. One of the Defendant's principal/co-member was served
10 with process on the Summons and Adversary Complaint on March 3,
11 2020.

12 4. The instant Defendant has been in negotiations with the
13 Plaintiff on the merits of the Adversary Complaint and believes a
14 settlement may be possible in this lawsuit.

15
16 5. The Plaintiff and Defendant agree to a 60-day extension
17 to allow further negotiations on the lawsuit.

18 6. It is in the best interest of both parties to extend
19 time for filing an Answer in this matter.

20 THE ABOVE IS AGREED AND ACCEPTED BY THE PARTIES

21
22 /s/Nathan R. Zeltzer
23 Attorney for Defendant
24 Reno Patios and Fireplaces, LLC

25
26 /s/
27 Attorney for Chapter 7
28 Trustee